

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

**BABY DOE, *et al.*,
Plaintiffs**

v.

**JOSHUA MAST, *et al.*,
Defendants.**

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Civil Action No. 3:22-cv-00049

MOTION TO QUASH SUBPOENA

NOW COMES Caleb Mast, by counsel, and moves to quash as to him the March 17, 2023, Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action served on Liberty University (*hereinafter*, the “Subpoena”).

For the reasons set forth in the Memorandum in Support of Motion to Quash, the Subpoena should be quashed as to Caleb Mast and LU should be ordered not to produce any thing from the email account of Caleb Mast because:

1. The disclosure would create a risk of harm to a non-party to this action;
2. The disclosure of the communications would violate Caleb and another’s First Amendment right to freedom of association, and
3. The disclosure of the communications would violate Caleb and another’s rights under the Religious Freedom Restoration Act.

Respectfully submitted,
CALEB MAST

/s/ Melvin E. Williams
Of Counsel

Mast Mot to Quash

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Counsel for Caleb Mast

CERTIFICATE OF SERVICE

On this 28th day of March 2023, the foregoing Notice of Appearance was filed with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to counsel of record.

/s/ Melvin E. Williams

Of Counsel